

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAHUL MANCHANDA,

Plaintiffs

vs.

NAVIENT STUDENT LOANS &
EDUCATIONAL CREDIT MANAGEMENT
CORPORATION (“ECMC”),

Defendant/Third-Party
Plaintiff

(WHP)

Index No. 1:19-cv-05121

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and upon the supporting memorandum of law, affidavits, and all prior proceedings had herein, Plaintiff RAHUL MANCHANDA, through undersigned counsel, will move this Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined, for an order granting summary judgment in favor of Plaintiff RAHUL MANCHANDA and against Defendant EDUCATION MANAGEMENT CORPORATION (“ECMC”) on Plaintiff’s Fair Debt Collection Practices Act (“FDCPA”) and New York State False Advertising and Deceptive Commercial Practices Claims.

WHEREFORE, Plaintiff RAHUL MANCHANDA respectfully moves this Court for Summary Judgment in his favor, determining that ECMC is liable under the FDCPA and New York State false advertising laws pursuant to GBL § 349 and for all other just and proper relief.

Dated: New York New York
May 25, 2021

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